Standard Operating Procedure
for
Local Limits Submittal Evaluation

Created on behalf of the California State Water Resources Control Board

August 2018

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1. Introduction

This document outlines the process for evaluating a local limits submittal from a publicly owned treatment works (POTW) pretreatment program. Water Board staff should review the submittal to ensure that it contains all of the information necessary to justify the calculations and allocations proposed by the POTW. Detailed information on how to calculate local limits may be found in EPA's *Local Limits Development Guidance* (2004). An example evaluation report is included as an attachment to this standard operation procedure (SOP). A Local Limits Review checklist is also provided to assist the review process. Water Board staff should consult the *Approval of New Program Submittals and Program Modification Standard Operating Procedure* for more information on approval procedures once it has been determined that a local limits submittal meets all regulatory requirements.

2. Identifying Pollutants of Concern

The POTW's local limits submittal should be reviewed to ensure that it identifies all potential pollutants of concern. At a minimum, the following parameters should be considered potential pollutants of concern:

- 15 national pollutants of concern, as identified in EPA's *Local Limits Development Guidance*.
- Parameters with established effluent limits in the POTW's National Pollutant Discharge Elimination System (NPDES) permit.
- Parameters that have a "monitoring only" requirement in the NPDES permit.
- Pollutants that have caused operational problems at the wastewater treatment plant (WWTP) or in the collection system.
- Pollutants that can be linked to POTW failure of a whole effluent toxicity (WET) test
- Pollutants regulated by 40 CFR Part 503 standards for the use or disposal of sewage sludge.
- Pollutants that may have the potential to exceed water quality criteria, including any California Toxic Rule parameters.
- Any additional site-specific pollutants of concern, including any pollutants that may be present in industrial user discharges that are not included in one of the categories above.

While the POTW is not required to develop a local limit for each of these parameters, the POTW should consider the need to develop a local limit for each of these parameters. The local limits submittal should document the POTW's rationale for not calculating a local limit for each potential pollutant of concern that was excluded from the calculations.

3. Monitoring Data

The submittal should include a description of the monitoring plan used to gather the analytical data used in the local limits calculations. The reviewer should evaluate the monitoring plan to ensure that an adequate number of samples have been collected at appropriate locations throughout the POTW and collection system. If the POTW has a previously approved monitoring plan, the reviewer should verify that the monitoring plan was followed.

The POTW's submittal should include analytical results for all samples taken in support of local limits development. Any outliers in the data should be noted in the POTW's submittal along with a brief explanation or justification for the exclusion of all outliers. The reviewer should verify that outliers were excluded from use in the POTW's local limits calculations. Additionally, the reviewer should verify that the submittal contains a sound rationale for any outliers excluded from the calculations.

Analytical results in the POTW's submittal should be based on appropriate analytical methods specified in 40 CFR Part 136. The reviewer should verify that approved analytical methods were used for all samples.

4. Removal Efficiencies

The POTW's submittal should include appropriate removal efficiencies for each parameter that is included in the local limits calculations. The reviewer should verify that the removal efficiency calculations are consistent with one of the methodologies specified in EPA's *Local Limits Development Guidance* (2004).

Where the POTW is unable to obtain adequate sample data to calculate a removal efficiency, book values may be used. The reviewer should ensure that the submittal specifies the source(s) of all book values. Additionally, the reviewer should verify that the most stringent book values are used in the calculations. Appendix R of EPA's *Local Limits Development Guidance* contains removal efficiency data for several parameters.

5. Maximum Allowable Headworks Loading (MAHL) Calculations

The reviewer should verify that the submittal includes an allowable headworks loading (AHL) calculation for all appropriate criteria for the POTW. These criteria should be protective of all limits identified in Section 2 of this SOP and typically include water quality-based limits, inhibition for both primary and secondary treatment, land application of biosolids, and worker health and safety issues. The reviewer should verify that the most stringent AHL is selected as the MAHL.

The reviewer should utilize the EPA Region 5 spreadsheet to check the POTW's MAHL calculation. The reviewer should compare the MAHL calculated with the spreadsheet with the MAHL calculated by the POTW. If the two MAHLs are substantially different, the reviewer should note the potential reason(s) for the differences in the MAHL.

6. Maximum Allowable Industrial Loading (MAIL) Calculations

The submittal should state the growth allowance and safety factor used for each parameter. The reviewer should use best professional judgement to confirm that the growth allowance and safety factor used in the calculations are appropriate for each parameter. Factors such as previous compliance issues with a particular parameter and planned increases in discharges to the POTW

(for either industrial or domestic sources) should be considered. Additionally, the reviewer should verify that the MAIL calculations account for loadings from hauled waste if the POTW is accepting hauled waste discharges.

7. Industrial User Allocation

The POTW's submittal should state the allocation method(s) used for each parameter. If multiple allocation methods are used, the submittal should state which allocation method is used for each parameter. The reviewer should verify that any allocation method chosen could not result in industrial user loadings that cumulatively exceed the MAIL.

Section 6.5 of EPA's *Local Limits Development Guidance* discusses the need for a "common sense assessment" to be conducted for the POTW's proposed local limits. The reviewer should ensure that the submittal addresses any concerns that may arise from this "common sense assessment". If the review reveals that the limits are not technologically achievable or there is not an analytical method in 40 CFR Part 136 that would show compliance with the method, the reviewer may request that the POTW evaluate an alternate allocation method for this parameter. Additional reasons for failure of the "common sense assessment", as well as practical solutions, are in included in Section 6.5 of EPA's *Local Limits Development Guidance.*

8. Report Summary

After completing a review of the POTW's submittal, the reviewer should determine whether the proposed local limits are approvable. If the submission meets all requirements, the reviewer should refer to the *Approval of New Program Submittals and Program Modification Standard Operating Procedure* for the correct approval procedure. If the submittal contains errors or omissions that would prevent the reviewer from approving the proposed local limits, the reviewer should prepare a report summarizing the errors or omissions that must be corrected. A local limits submittal evaluation report template and example reports are provided in Attachments B - D.

Attachment A: Local Limits Review Checklist

Local Limits Review Checklist
POTW/Program Name:

NPDES Permit No.:

- Pollutants of Concern Identified
  - ☐ 15 National Pollutants of Concern
  - ☐ NPDES Pollutants (including parameters limited in NPDES permit, NPDES "monitoring only" pollutants, pollutants that have caused POTW violations or operational problems, or any pollutant responsible for failure of WET test)
  - ☐ Biosolids regulated pollutants (including those necessary for protecting future disposal options)
  - ☐ Water quality criteria pollutants (including any California Toxic Rule parameters)
  - ☐ Any site-specific pollutants of concern (including any pollutants expected to be present in industrial user discharges not previously covered above)

- Monitoring Data
  - ☐ Follows approved monitoring plan
  - ☐ Includes sample results for all appropriate pollutants of concern
    - Paired POTW influent and effluent data (or appropriate book values)
    - Aerobic/Anaerobic Digester
    - Biosolids to Disposal
    - Activated sludge
    - Domestic/Uncontrollable sites
    - SIUs
    - Hauled waste
  - ☐ Excludes outliers
  - ☐ Appropriate analytical methods used, samples analyzed within holding times, etc.

- Removal Efficiencies
  - ☐ Calculated using appropriate analytical data OR uses appropriate book values
  - ☐ Includes primary, secondary, and tertiary removal efficiencies

- Maximum Allowable Headworks Loading (MAHL) Calculations
  - ☐ Uses appropriate Water Quality Based (WDR/NPDES) limits where appropriate (including both chronic and acute criteria)
  - ☐ Uses appropriate inhibition values for both primary and secondary treatment
  - ☐ Uses appropriate biosolids criteria based on disposal option
  - ☐ Protects worker health and safety

- Maximum Allowable Industrial Loading (MAIL) Calculations
  - ☐ Based on the most stringent MAHL criteria
  - ☐ Takes any hauled waste into account
  - ☐ Uses appropriate safety factor
  - ☐ Uses appropriate growth allowance
  - ☐ Considers all background sources

- Allocation Method _____
  - ☐ Method(s) chosen is protective, enforceable, and reasonable
  - ☐ States appropriate limit duration and units
  - ☐ Are limits achievable?
  - ☐ Can compliance be determined?

Date of Approval Authority Review: _____

Approval Authority Reviewer: _____

Date of Public Notice: _____

Date Limits Adopted by Control Authority: _____

Attachment B: Local Limits Verification Report Template

[Control Authority] Local Limits

Verification Report

Discharger:	[Control Authority] [NPDES Permit or WDR No.] [Control Authority County]
Location:	[Control Authority Address]
Date:	[Date of Report]
Reviewed By:	[Reviewer Name and Title]

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Attachments

Attachment A [A copy of the POTW's local limits submittals]
Attachment B [The reviewer's calculations created using EPA Region 5's spreadsheets]

1. Executive Summary

This section should include a brief summary of the reviewer's findings.

2. Deficiency #1

The reviewer should include a section for each deficiency identified during the review of the POTW's local limits submittal. If there are multiple deficiencies of a single category (i.e. identification of pollutants of concern, calculation of removal efficiencies, etc.), they may be addressed in the same section of the report. Alternatively, the report may address all the deficiencies related to a single parameter in one section.

3. Deficiency #2

(See Section 2 above.)

4. General Report Deficiencies

This section may be used to summarize any deficiencies in the report that do not directly impact the POTW's local limits calculations. These are items that should be addressed in future revisions to the report. Appropriate items for this section would include incorrect references, typographical errors, and other errors or omissions that could create confusion during the public review period.

Attachment C: Example Local Limits Report (Malaga County Water District)

Malaga County Water District Local Limits

Verification Report

Discharger:	Malaga County Water District NPDES Permit No. CA0084239 Fresno County
Location:	3749 South Maple Avenue, Fresno, CA 93725
Date:	May 26, 2017
Reviewed By:	Yatasha Moore, EPA Contractor

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Attachments

Attachment A Malaga County Water District Local Limits Evaluation Report (July 2016)
Attachment B Malaga Local Limits Calculations (July 2016)

[Note: Attachments A and B not included in the example report for this SOP.]

1. Executive Summary

The Central Valley Regional Water Quality Control Board (Water Board) conducted a review of the Malaga County Water District (District) *Local Discharge Limits Development* (local limits report) dated July 26, 2016. The District was issued a National Pollutant Discharge Elimination System (NPDES) Permit No. CA0084239 (Order No. R5-2014-0145) and Cease and Desist Order R5-2014-0146 (CDO) in 2014. The CDO required the District to evaluate the need to revise its local limits. This verification report presents the conclusions of the review from the District's local limits report.

The District owns and operates the Malaga County Water District Wastewater Treatment Facility (WWTF). The WWTF receives wastewater from the unincorporated community of Malaga, serving a population of approximately 1,300. The WWTF has an average dry weather design capacity of 1.2 million gallons per day (mgd). The WWTF treatment consists of three screw pumps (one in service at a time,), a mechanically cleaned bar screen, an aerated grit chamber, one primary clarifier (DAF unit), three activated sludge aeration tanks, and three secondary clarifiers. Tertiary treatment includes filtration ("fuzzy" filter) and disinfection with ultraviolet light. Per the WDR, up to 0.85 mgd of undisinfected, secondary treated effluent can be disposed to groundwater via 23 acres of disposal ponds, and up to 0.45 mgd of disinfected, tertiary treated effluent can be discharged to the Fresno Irrigation District (FID) Central Canal. Per the local limits report, secondary solids are aerobically digested and dewatered in drying beds prior to being hauled offsite for land application by a contract hauling company. However, the District's February 2017 eSMR states that solids are currently being disposed via landfill.

On the basis of the local limits report reviewed, the reviewer made the following findings:

- The District did not include an explanation for all parameters that were not included as pollutants of concern.
- It is recommended that the District evaluate Nitrate plus Nitrite (as N) as a pollutant of concern.
- The water quality limits used in the calculations for several parameters are based on a higher hardness concentration than the one used in developing the Waste Discharge Requirements (WDR).
- The District did not determine removal efficiencies in a consistent manner.
- At least two industrial users have the potential to exceed the proposed local limits and must be evaluated for the need to be permitted as significant industrial users (SIUs).
- The District did not provide justification that the proposed allocation method would not result in exceedance of the maximum allowable industrial loading (MAIL).
- It is recommended that the District evaluate ethylbenzene as a pollutant of concern.
- It is recommended that several narrative errors be corrected in order to clarify the local limits report.

2. Identification of Pollutants of Concern

The local limits report details a screening process from the 2004 *Local Limits Development Guidance* manual to determine which parameters are pollutants of concern. This screening process evaluates the WWTF sampling data to determine the pollutants of concern.

Based on the screening process, Table 2-6 of the District's local limits report states that chromium is a pollutant of concern due to a sludge concentration that is more than one-half the applicable sludge disposal limit However, there is not currently a limit for chromium in 40 CFR Part 503. The District does have an existing chromium local limit and chromium is one of the 15 national pollutant of concerns identified in the *Local Limits Development Guidance* manual. Therefore, chromium should still be considered a pollutant of concern, but Table 2-6 should be revised to remove the statement that the chromium sludge concentration is more than half the sludge disposal standard.

Section 5 of the local limits report states that benzene is not a pollutant of concern "because benzene was never detected in the influent or effluent of the water plant." However, the report does not specifically state why phenols is not a pollutant of concern. Additionally, silver was not detected in the influent or effluent, but a local limit was still proposed for this parameter. In order to make the local limits report more defensible, the District should include in the local limits report the rationale for why a local limit for silver is still being proposed.

3. Nitrate plus Nitrite (as N)

The District's local limits report did not include Nitrate plus Nitrite (as N) as a pollutant of concern. However, the Waste Discharge Requirements (WDR) contains an effluent limit of 10 mg/L for Nitrate plus Nitrite (as N) and a groundwater limit of 10 mg/L for Nitrate (as N). The data in Appendix A of the local limits report indicates that the average effluent concentration of Nitrate was 17.95 mg/L. Because the District has a WDR limit for Nitrate plus Nitrite (as N) and the effluent concentration of Nitrate is greater than this effluent limit, it is recommended that the District evaluate Nitrate plus Nitrite (as N) as a pollutant of concern and consider developing a local limit for this parameter.

4. Metals Controlling Limits

Table 2-5 (Summary of Controlling Limits) states that the controlling limits for lead, nickel, selenium, silver, and zinc are based on the California Toxics Rule 4-day average concentration for freshwater aquatic life. The fact sheet for the WDR states that the hardness of the receiving stream is 85 mg/L. However, the water quality limits used in the local limits report are based on a hardness concentration of 100 mg/L which results in higher water quality limits. 40 CFR 403.5(c) requires the development of local limits to prevent the discharge of pollutants that may cause pass through or interference. Because the California Toxics Rule 4-day average concentrations for freshwater aquatic life for these metal parameters are dependent on the hardness of the receiving stream, the District is required to either include a justification for why the higher hardness limit was used or use the lower hardness concentration identified in the WDR in determining the water quality limits for these parameters.

5. Removal Efficiencies

A summary of the removal efficiencies used in the calculations was included in the local limits report at Table 4-1. However, the data in Appendix A indicates that the removal efficiency for Boron is 14%. Using the lower removal efficiency of 0% results in a local limit that is more stringent. However, it is recommended that the local limits report document the rationale for using this lower removal efficiency.

Additionally, the local limits report did not consistently state the removal efficiency for parameters that were not detected in either the influent or the effluent of the WWTF. Silver was not detected in any of the influent or effluent samples, and the calculations used a removal efficiency of 100%. However, influent and effluent samples for the parameters benzene and phenols were also all below detectable limit (BDL), but the removal efficiency for these two parameters in the local limits report is 0%. It is recommended that the District document the rationale for using a removal efficiency of 100% for silver while using a removal efficiency of 0% for benzene and phenols.

6. Sampling

Section 4 of the local limits report states that the influent sampling location at the WWTF is "a combination of raw influent with return water from the grit removal return flow," and grit removal return is approximately 37% of the total headworks flow. The District has sampled the grit return stream, but these sample results were not available at the time the local limits report was submitted. The District should review the grit sample data and determine if including this grit return stream in the influent sampling point results in local limits calculations that are less stringent than if this stream was not included.

7. Industrial Users

Section 5.2 states that samples at two industrial users, Caps Sandblasting and Island Pools, had higher than domestic concentrations for electroconductivity and BOD. However, the report did not include the electroconductivity and BOD concentration values for these two industries, and District has not classified these two industries as significant industrial users. 40 CFR Part 403.08(f)(2)(i) requires the District to identify and locate all possible significant industrial users. Without the actual measured values, the review is unable to determine the potential for exceeding any local limit. Therefore, the District is required to evaluate Caps Sandblasting and Island Pools to determine if they should be classified as SIUs due to potential to exceed the local limits for electroconductivity and BOD.

8. Allocation Method

Section 5 of the local limits report discusses the proposed allocation method for the MAIL. However, Section 5.3.1 states that the District did not set aside any allocation for a growth allowance. While the current WWTF flow rate is less than 50% of the design flow and substantial growth is not currently anticipated, significant increases in the loadings to the WWTF, from either existing industrial users or residential growth, could result in loadings to the WWTF that exceed the MAHL. It is strongly recommended that the District perform a yearly

evaluation the calculations in the local limits report to ensure that the calculations are still protective of the WWTF and recalculate local limits if loadings exceed 80% of the MAHL or design flow.

Additionally, Section 5.9 discusses a change in allocation for batch dischargers and small dischargers. While the increased limits for batch dischargers will be evaluated at least yearly, the local limits report did not state that the increased limit for small dischargers would be periodically reviewed. Additionally, the local limits report did not include calculations showing that the proposed increase for small dischargers of 5 times the local limit would not cause the WWTF to exceed the MAHL. 40 CFR Part 403.5(c) requires the development of local limits to prevent the discharge of pollutants that will cause pass through or interference, and Section 6.4 of the Local Limits Guidance Document discusses various ways to allocate available loadings to industrial users. The District is required to provide documentation showing that the increased limits for small dischargers will not cause the WWTF to exceed the MAHL, and it is strongly recommended that the District review these calculations at least yearly.

The submittal also included an Excel file of the supporting calculations. This file included a spreadsheet of industrial user allocations. However, the industries listed in this tab are not the same industries listed in Table 1-1 of the local limits report and the total flow from all industries on this tab exceeds the total flow to the WWTF. The District is required to show that the total allocations to all industrial users will not cause an exceedance of the MAHL.

9. Fume toxicity

Section 5.7.1 states "There were two POCs identified in Table 2-5 that have fume toxicity exposure limits that indicate they may create a toxicity exposure issue for collection system workers. The three POCs were chloroform, ethylbenzene, and toluene." However, Table 2-5 of the report did not include ethylbenzene as a pollutant of concern, and there were no calculations for an ethylbenzene local limit. It is recommended that the District consider evaluating ethylbenzene as a pollutant of concern.

10. General Report Deficiencies

In addition to the comments above, the local limits report contained several general reporting errors. These items do not impact the District's ability to adopt the local limits, but they should be addressed in future revisions to the report.

1. Section 4.4 states that inhibition calculations are based on "Table 4-1 from the EPA *Local Limits Development* manual." However, Table 4-1 of this document is titled "Minimum Recommended Sampling Day for Initial Local Limits Development," and inhibition data is listed in Appendix G.
2. Table 5-1 (Comparison of MAHLs with Average Headworks Loadings) states that the average influent concentration of MBAS is 60% of the MAHL. However, the calculations in Table 19 of Appendix A indicate that the average influent concentration of MBAS is 65.77% of the MAHL.

3. Table 5-2 (Residential and Background Pollutant Averages) lists the residential and background pollutant averages for cadmium, lead, nickel, and silver as 0.00 mg/L due to rounding. However, these parameters were actually detected during sampling.
4. The calculations in Appendix A included an averaged pH value. However, pH is a logarithmic parameter and cannot be averaged.

Attachment D: Example Local Limits Report (City of Davis)

City of Davis Local Limits

Verification Report

Discharger:	City of Davis NPDES Permit No. CA0079049 Yolo County
Location:	45400 County Road 28H, Davis, CA 95616
Date:	September 26, 2017
Reviewed By:	Yatasha Moore, EPA Contractor

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Attachments

Attachment A City of Davis Local Limits Report (November 2015)
Attachment B Davis Local Limits Calculations (July 2017)

[Note: Attachments A and B not included in the example report for this SOP.]

1. Executive Summary

Central Valley Regional Water Quality Control Board (Water Board) staff conducted a review of the City of Davis (City) *Local Limits Report* (local limits report) dated November 2015. The City was issued a National Pollutant Discharge Elimination System (NPDES) Permit No. CA0079049 (Order No. R5-2013-0127-01) in 2013. The NPDES Permit required the District to evaluate the need to revise its local limits. This verification report presents the conclusions of the review from the City's local limits report.

The City owns and operates the Davis Wastewater Treatment Plant (WWTP). The WWTP receives wastewater from the City and unincorporated areas in Yolo County. The WWTP has an average dry weather design capacity of 7.5 million gallons per day (mgd). The WWTP treatment consists of mechanical bar screening, aerated grit removal, primary sedimentation, biological treatment through three facultative ponds, two aerated ponds, overland flow treatment, disinfection and dechlorination. Per the City's local limits report, the City is currently upgrading the WWTP, including converting the current treatment pond treatment system to a conventional activated sludge process and adding filtration, disinfection, and mechanical solids thickening, dewatering, and storage facilities. The upgrades are scheduled to be completed by October 2017.

On the basis of the local limits report reviewed, the reviewer made the following findings:

- It is recommended that Table 1 of the local limits report be revised to reflect that the WWTP has NPDES permit effluent limits for cadmium and selenium.

- It is recommended that the local limits report document the rationale for not considering electrical conductivity, diazinon, and chlorpyrifos pollutants of concern.

- It is recommended that the maximum pH limit be lower than 12.5 standard units.

- The City is required to provide documentation showing that the current total suspended solids (TSS) local limit, which is proposed to be retained, is protective of the WWTP.

- The City is required to provide documentation showing that the current nickel local limit is protective of the WWTP.

2. Identification of Pollutants of Concern

The local limits report details a screening process from the 2004 *Local Limits Development Guidance* manual to determine which parameters are pollutants of concern. This screening process evaluates the WWTP sampling data to determine the pollutants of concern.

Based on the screening process, Table 1 of the City's local limits report includes cadmium and selenium as pollutants of concern. However, the Table does not state that these two parameters have NPDES permit effluent limitations. Because the City's NPDES permit contains effluent

limits for both of these parameters for Discharge Point No. 001, it is recommended that Table 1 be revised to reflect that the City has NPDES limits for cadmium and selenium.

Additionally, the City has NPDES effluent limits for electrical conductivity, diazinon, and chlorpyrifos. However, these parameters were not evaluated as pollutants of concern. Because there are NPDES permit effluent limits for these parameters, it is recommended that the local limits report include a rationale for why electrical conductivity, diazinon, and chlorpyrifos are not pollutants of concern.

3. pH

Section 4.2.2 of the local limits report states that the upper pH local limit will remain at 12.5 standard units. However, this is the same pH level at which a discharge is subject to the hazardous waste reporting requirements in 40 CFR Part 403.12(p). If the City's intention is to prohibit the discharge of wastes that are subject to this reporting requirement, it is recommended that the maximum pH limit be lower than 12.5 standard units.

4. Total Suspended Solids

Section 6 of the local limits report states that even though both a maximum allowable headworks loading and a maximum allowable industrial loading (MAIL) could be calculated for total suspended solids (TSS), "industrial user compliance with the local limit for TSS will be infeasible." Additionally, the City plans to maintain the current local limit until upgrades to the WWTP are completed. However, local limits calculations should be protective of the WWTP and the collection system and do not take into account potential compliance by the industrial users. Because the calculated MAIL indicates that the TSS loadings from industrial users has the potential to cause the WWTP to exceed the design capacity resulting in effluent violations, the City is required to either provide documentation that the current TSS local limit is protective of the WWTP or allocate the MAIL in such a way that limits are protective of the WWTP. In order to relieve the compliance burden on industrial users, the MAIL could be allocated on a contributory basis.

5. Nickel

Section 6 of the local limits report states that a MAIL for nickel was not calculated because the WWTP appears to be source of nickel. Additionally, the City is planning to maintain the current nickel local limit until the WWTP upgrade is completed. The City's Local Limits Sampling Plan (included as Appendix A of the local limits report), does not require effluent sampling to be conducted one detention time after the influent sampling. Therefore, influent and effluent sampling results cannot be paired. The City should take appropriate actions to determine if failure to pair influent and effluent data is the source of the negative removal efficiency for nickel. Additionally, the City is required to provide documentation showing that the current nickel local limit is protective of the WWTP.